

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

IN RE: AQUEOUS FILM-FORMING FOAMS
PRODUCTS LIABILITY LITIGATION

Master Docket No.: 2:18-mn-2873-RMG

This document relates to:
See Exhibit A Attached Hereto

**STIPULATION OF DISMISSAL WITH PREJUDICE PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE 41(a)(1)(A)(ii)**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs in the actions identified in Exhibit A attached hereto and Defendants Tyco Fire Products LP (“Tyco”), Chemguard, Inc. (“Chemguard”), and ChemDesign Products, Inc. (“ChemDesign”) hereby stipulate and agree to a dismissal with prejudice of all Plaintiffs’ Claims against Tyco, Chemguard, ChemDesign, and any other Released Parties¹ in the actions identified in Exhibit A pursuant to Plaintiffs’ decision to participate in the Settlement Agreement Between Public Water Systems and Tyco dated April 12, 2024 (the “Settlement Agreement”), which received final approval on November 22, 2024, from the Court overseeing *In Re: Aqueous Film-Forming Foams Products Liability Litigation*, MDL No. 2:18-mn-2873 (D.S.C.).

Each party shall bear its own costs.

¹ Unless otherwise indicated, all capitalized terms in this motion have the meaning given to them in the Settlement Agreement.

Dated: May 22, 2025

Respectfully submitted,

/s/ Tate J. Kunkle

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